

IN THE DRAWINGS

Applicants submit herewith replacement Figures 32 and 53 in compliance with 37 C.F.R.

1.121(d).

REMARKS

The drawings are objected because certain words in the drawings are misspelled. Revised drawings with corrected spellings are submitted herewith. Withdrawal of the objection in light of the revised drawings is respectfully requested.

Claims 33-41 are pending in the application. Claims 33-39 and 41 stand rejected under 35 U.S.C. § 103 as being obvious over the combination of Moezzi, Thiesson, and Biswas. This rejection is respectfully traversed. The Office Action relies on Moezzi as teaching the first two limitations of Claim 33. The second element of Claim 33 recites “a simulation and gaming environment in communication with the database for determining a threat vector and a likelihood that the threat will succeed” (emphasis added). Moezzi is concerned with a system for generating “immersive video,” which is defined at col. 9, lines 46-67 of Moezzi. Basically, Moezzi’s system allows a user to choose a vantage point from which a scene will be viewed and creates video for the scene based on the selected vantage point. Moezzi has nothing to do with “determining a threat vector” or “a likelihood that that threat will succeed” as required by claim 33. The only vectors discussed in Moezzi pertain to vectors associated with tracking objects in video of real scenes by a frame differences technique. See, e.g., Moezzi at col. 28, line 1 – col. 29, line 8. These real scenes are, by definition, depictions of events that have already occurred. Tracking objects in video of real scenes is far different from “determining a threat vector” associated with a threat that has not yet occurred. Accordingly, there is no disclosure of the second element of claim 33 in Moezzi. Applicants therefore respectfully request withdrawal of the rejections of claims 33-39 and 41 for this reason alone.

Applicants further note that the Office Action at page 6 mischaracterized Moezzi as teaching that “AI knowledge-based techniques (i.e., expert knowledge systems) can be applied to the risk analysis of any undesirable (unpredictable) or hazardous event,” citing Moezzi at col. 48, lines 5-45. The cited passage of Moezzi, however, has nothing to do with any artificial

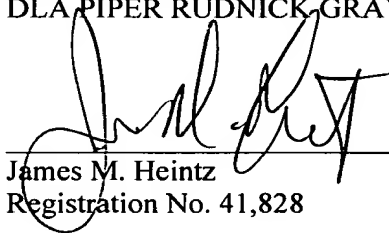
knowledge-based technique or any expert system. Rather, the cited passage of Moezzi discussed capturing images of an expert golfer and comparing such image with the swing of a student golfer. In such a case, it is the "student golfer and/or his/her instructor" that subsequently "plays back the swing" from a selected vantage point as discussed at col. 48, lines 35-39 and analyzes the swings in the images. Thus, it is the user and not the system that performs the expert analysis. The system is not an expert system at all; rather, the system simply creates video using images of an expert. Withdrawal of the rejection for this reason is also requested.

Claim 40 stands rejected under 35 U.S.C. § 103 as being obvious over the three referenced mentioned above in combination with a fourth reference, the Installation Force Protection Guide (IFPG). The IFPG is only relied on for the additional limitations in Claim 40 and does not supply the missing limitations discussed above in connection with Claim 33. Accordingly, withdrawal of the rejection of Claim 40 is requested for at least the reasons discussed above.

Applicants submit that the application is now in condition for examination on the merits. Early notification of such action is earnestly solicited. Should the Examiner have any suggestions to place the application in even better condition for allowance, Applicants request that the Examiner contact the undersigned representative at the telephone number listed below.

Respectfully submitted,

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